

**Remarks**

This Application has been carefully reviewed in light of the Office Action mailed August 23, 2004. Applicants appreciate the Examiner's consideration of the Application. Applicants have made clarifying amendments to Claims 1-3, 7, and 9, and have canceled Claims 4-5 without prejudice or disclaimer. Certain of these amendments are not considered narrowing or necessary for patentability. Applicants have also added new Claims 10-47, none of which add any new matter. Applicants respectfully request reconsideration and allowance of all pending claims, and consideration and allowance of all new claims.

**I. Information Disclosure Statement**

Applicants mailed Information Disclosure Statements (IDSs) and accompanying PTO-1449 forms on July 18, 2001 and January 8, 2002, but the submitted references were not indicated as considered by the Examiner in this Office Action. Additionally, Applicants mailed a Request for Consideration of an Information Disclosure Statement Timely Filed on September 17, 2004. Applicants respectfully request the Examiner to indicate consideration of the submitted references by initialing next to each reference on the PTO-1449 forms. For the Examiner's convenience, copies of the IDSs and PTO-1449 forms are attached to this Response.

**II. Applicants' Claims are Allowable over the Proposed *Glasser-PAG* Combination**

The Examiner rejects Claims 1-9 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 5,956,715 to Glasser, et al. ("*Glasser*") in view of "Purveyor Administrator's Guide" ("*PAG*"). Applicants respectfully disagree and discuss independent Claim 1 as an example.

At a minimum, neither *Glasser* nor *PAG*, whether considered alone or in combination, disclose, teach, or suggest the following limitations recited in Claim 1, as amended:

- a plurality of roles defining user rights to access one or more of the plurality of assets, each member associated with at least one role;
- at least one domain being an administrative and access control boundary around a plurality of security entities, the security entities of the at least one domain comprising:
  - a subset of the plurality of assets and the access control lists

- corresponding to the assets in the subset of the assets;
- a subset of the plurality of roles; and
- a subset of the members;
- each privilege defined in the access control lists of the at least one domain identifying one or more roles in the domain that may access the asset corresponding to the privilege;
- the security system operable to authorize a particular member to perform a requested operation with respect to a requested asset within the domain when the particular member is associated with a role, in the domain, corresponding to a privilege for the requested asset.

For example, *Glasser* fails to disclose, teach, or suggest “a plurality of roles defining user rights to access one or more of the plurality of assets, each member associated with at least one role,” as recited in Claim 1 as amended. The Examiner apparently equates the list of user groups disclosed in *Glasser* with the “plurality of roles” recited in Claim 1. (See Office Action, Page 2; *Glasser*, Column 5, Line 58) Applicants respectfully submit that this equation is improper. For example, a role does not necessarily require a group of users. A role could be assigned to a single user or a group of users. Indeed, Applicants’ Specification even describes groups 32 and roles 34 as distinct entities in the example system described in the Specification. (See Specification, Pages 8 and 18-19) Thus, while *Glasser* discloses lists of user groups, *Glasser* fails to disclose, teach, or suggest “a plurality of roles defining user rights to access one or more of the plurality of assets, each member associated with at least one role,” as recited in Claim 1 as amended. *PAG* fails to account for this deficiency of *Glasser*.

As another example, neither *Glasser* nor *PAG* discloses, teaches, or suggests the “at least one domain,” as recited in Claim 1. The Examiner apparently acknowledges that *Glasser* fails to teach the at least one domain recited in Claim 1. (See Office Action, Page 3) However, the Examiner argues that *PAG* does teach this limitation, stating that *Glasser* “does not teach for the network to comprise the Internet which uses resources on many domains. *PAG* teaches an access control system for use on Internet servers using access control lists and restricting by domain.” (Office Action, Page 3, citations omitted) As disclosing this at least one domain (as recited in Claim 1 prior to the amendments presented in this Response), the Examiner references *PAG*’s disclosure that access can be controlled based upon the client’s IP address. (See Office Action, Page 3; *PAG*, Page 1, Line 9) Applicants respectfully

submit that the mere disclosure in *PAG* that access can be controlled based upon a client's IP address fails to disclose, teach, or suggest the "at least one domain," as recited in Claim 1. In particular, restricting access based on a client's IP address fails to disclose, teach, or suggest "at least one domain being an administrative and access control boundary around a plurality of security entities, the security entities of the at least one domain comprising: a subset of the plurality of assets and the access control lists corresponding to the assets in the subset of the assets; a subset of the plurality of roles; and a subset of the members," as recited in Claim 1 as amended.

As another example, at least because *Glasser* and *PAG* fail to disclose, teach, or suggest the "at least one domain," as recited in Claim 1, both *Glasser* and *PAG* necessarily fail to disclose, teach, or suggest "each privilege defined in the access control lists *of the at least one domain* identifying one or more roles *in the domain* that may access the asset corresponding to the privilege" and "the security system operable to authorize a particular member to perform a requested operation with respect to a requested asset *within the domain* when the particular member is associated with a role, *in the domain*, corresponding to a privilege for the requested asset," as recited in Claim 1 as amended.

Moreover, Applicants do not admit that it is possible to combine *Glasser* and *PAG* in the manner proposed by the Examiner or that the Examiner has shown the requisite teaching, suggestion, or motivation in the cited references to combine or modify the *Glasser* and *PAG* in the manner proposed by the Examiner.

For at least these reasons, Applicants respectfully request reconsideration and allowance of independent Claim 1 and its dependent claims. For substantially similar reasons, Applicants respectfully request reconsideration and allowance of independent Claim 7 and its dependent claims.

### **III. New Claims 10-47 are Allowable**

In addition to being dependent on allowable independent claims, new Claims 10-21 (which depend from independent Claim 1) and new Claims 22-33 (which depend from independent Claim 7) recite further patentable distinctions over the prior art of record. To

avoid burdening the record and in view of the clear allowability of independent Claims 1 and 7, Applicants do not discuss these distinctions in this Response. However, Applicants reserve the right to discuss these distinctions in a future Response or on Appeal, if appropriate. Furthermore, new Claims 34-47 are directed to software and are allowable for at least the same reasons discussed above with reference to Claims 1-3 and 6 and new Claims 10-21 (which Applicants have shown to be allowable).

**IV. No Waiver**

All of Applicants' arguments and amendments are without prejudice or disclaimer. Additionally, Applicants have merely discussed example distinctions from the references cited by the Examiner. Other distinctions may exist, and Applicants reserve the right to discuss these additional distinctions in a future Response or on Appeal, if appropriate. By not responding to additional statements made by the Examiner, Applicants do not acquiesce to the Examiner's additional statements. The example distinctions discussed by Applicants are sufficient to overcome the Examiner's rejections.

**Conclusion**

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Christopher W. Kennerly, Attorney for Applicants, at the Examiner's convenience at (214) 953-6812.

The Commissioner is hereby authorized to charge the amount of \$450.00 to Deposit Account No. 02-0384 of Baker Botts L.L.P. to cover the cost of twenty-five new claims total over twenty. Although Applicants believe no other fees are due, the Commissioner is hereby authorized to charge any other fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

BAKER BOTTS L.L.P.  
Attorneys for Applicants



Christopher W. Kennerly  
Reg. No. 40,675

Date: November 23, 2004

Correspondence Address:

Customer No.:

**05073**



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|   | Filed  |

Inventor(s): Daniel Brown et al.

Serial No.: 09/800,168

Receipt Date & Serial No.:

Title: Computer Security System

Client/Applicant: i2 Technologies,  
Inc.

BB File No.: 020431.0971

Mailed: 9/17/2004

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: Daniel Brown et al  
U.S. Patent Serial No.: 09/800,168  
Filing Date: March 5, 2001  
Examiner: Jonathan R. Adams  
Group No.: 2134  
Confirmation No.: 3597  
Title: *Computer Security System*

Commissioner for Patents  
P.O. Box 1450  
Alexandria, Virginia 22313-1450

Dear Sir:

<p>I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, Virginia 22313-1450, on <u>9-17-2004</u>.</p> <p><u>Elaine Bane</u> Name</p> <p><u>9-17-2004</u> Date of Signature</p>
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**REQUEST FOR CONSIDERATION OF AN INFORMATION  
DISCLOSURE STATEMENT TIMELY FILED**

For reasons set forth below, it is respectfully requested that the PTO file for this application be promptly forwarded to Examiner Jonathan R. Adams, for confirmation that the references listed on the PTO-1449 forms attached to the Information Disclosure Statements filed on the following dates have been considered: July 18, 2001 and January 8, 2002.

On the dates listed in the first paragraph on page 1 of this document, Applicants filed Information Disclosure Statements (IDS) with PTO-1449 forms attached, listing the references submitted for consideration. Copies of the cited references were also included. The Information Disclosure Statements were received at the U.S. Patent and Trademark


DAL01:814949.1

Office on the dates listed in the first paragraph on page 1 of this document as shown on the returned, date-stamped postcards, copies of which are attached. For the convenience of the Examiner, copies of the Information Disclosure Statements and the cited references filed on the dates listed in the first paragraph on page 1 of this document are enclosed.

An Office Action for this application was mailed on August 23, 2004. However, Examiner Jonathan R. Adams has not returned copies of the PTO-1449 forms indicating consideration of the references cited in the Information Disclosure Statements filed on the dates listed in the first paragraph on page 1 of this document listed.

Accordingly, **Applicants hereby requests confirmation of consideration of the previously filed Information Disclosure Statements.** Examiner Jonathan R. Adams is requested to initial the references listed on the PTO-1449 forms to show that they were appropriately considered during examination of this Application. The Commissioner is hereby authorized to credit any overpayment, or to charge any additional fee required by this paper, to Deposit Account No. 02-0384 of Baker Botts L.L.P.

BAKER BOTTS L.L.P.  
Attorneys for Applicants

  
Christopher W. Kennerly  
Reg. No. 40,675

2001 Ross Avenue, Suite 600  
Dallas, Texas 75201-2980  
(214) 953-6812

Enclosures: Copies of Information Disclosure Statements filed on dates listed in the first paragraph on page 1 of this document with PTO-1449 forms and copies of the cited references;  
Copies of acknowledgment post cards showing  
date stamps of dates listed in the first paragraph on page 1 of this document

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<input type="checkbox"/> Amendment/Response	_____	<input checked="" type="checkbox"/> Other <u>Information Disclosure Statement w/4 references</u>	

Name of Inventor(s): Daniel Brown, et al.

Title of Invention: Computer Security System

Client or Applicant: i2 Technologies US

BB File No.: 020431-0971

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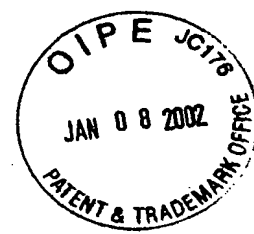
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: Daniel Brown, et al.  
Serial No.: 09/800,168  
Date Filed: March 5, 2001  
Title: Computer Security System

Honorable Assistant Commissioner  
for Patents  
Washington, DC 20231

Dear Sir:

**INFORMATION DISCLOSURE STATEMENT**

Applicants respectfully request, pursuant to 37 C.F.R. §§ 1.56, 1.97 and 1.98, that these references listed on the attached PTO-1449 form be considered and cited in the examination of the above-identified patent application. Copies of these references are enclosed for the convenience of the Examiner. No representation is made that a search has been made, that these references are material to the patentability of the present application, or that these references qualify as prior art.

This Information Disclosure Statement is being submitted pursuant to 37 C.F.R. § 1.97(b).

Each item of information contained in this Information Disclosure Statement was cited in a communication from a foreign patent office in a counterpart foreign application not more than thirty days prior to the filing of this Information Disclosure Statement.

Although Applicants believe no fee is due, the Commissioner is hereby authorized to charge any fee to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

BAKER BOTTS L.L.P.



Christopher W. Kennerly  
Reg. No. 40,675  
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(214) 953-6812

Date: 1/8/02

PTO-1449

Application No.

Applicant(s)

**Information Disclosure Citation  
In an Application**

09/800,168

Daniel Brown, et al.

Docket Number

Group Art Unit

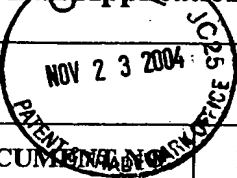
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020431.0971

2131

March 5, 2001

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**U.S. PATENT DOCUMENTS**

		DOCUMENT NO.	DATE	NAME	CLASS	SUBCLASS	FILING DATE
	A	5,315,657	05/24/94	Abadi et al.	380	25	09/28/90
	B	5,748,890	05/05/98	Goldberg et al.	395	188.01	12/23/96
	C	US 6,182,124 B1	01/30/01	Lau et al.	709	217	06/10/98
	D						
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							YES	NO
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	R	PCT Written Opinion, 7 pages	21 Dec. 2001
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U.S. PATENT AND TRADEMARK OFFICE

PTO-1449

Application No.

Applicant(s)

**Information Disclosure Citation  
In an Application**

09/800,168

Donald S. Brown, et al.

Docket Number

Group Art Unit

Filing Date

020431.0971

March 5, 2001

**U.S. PATENT DOCUMENTS**

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I							
J							
K							
L							

	DOCUMENT (Including Author, Title, Source, and Pertinent Pages)	DATE
M	R. Sant'Angelo, "Windows NT 4® Administrator's Survival Guide," Copyright © 1997 by Sams Publishing, Index, Table of Contents (3 pages), pps. 130, 191, 193-209, 213-218, 253-260, 279-281, 407, 417-418, 422, 503, 528-532, <a href="http://emedi48.netlibrary.com/api-bin/...234.nfo&amp;record={1625}&amp;softpage=Document">http://emedi48.netlibrary.com/api-bin/...234.nfo&amp;record={1625}&amp;softpage=Document</a>	May 17, 2001
N	G.W. Kadnier, "Windows NT 4: The Complete Reference," Osborne/McGraw-Hill © 1997, Table of Contents, Chapter 16: NT 4 Security, 5 pgs., NT 4 Security, Bare to the Bone 7 pgs., NT 4 Security, The NT Miranda—"You Have the Right To...," 1 pg., NT 4 Security, NT C2-Level Security, 1 pg., NT 4 Security, Controlling Security and Users: The NT User Manager, pps. 1-6, 8 <a href="http://library.books2x7.com/toc.asp?bkid">http://library.books2x7.com/toc.asp?bkid</a>	May 18, 2001
O	B. Sosinsky, "Windows NT 4 Answers! Certified Tech Support," Osborne/McGraw-Hill © 1998, Synopsis and Table of Contents, Back Cover, NT 4 Answers! Certified Tech Support, Working With The Security Model @ a Glance, 1 pg., NT 4 Answers! Certified Tech Support, The Security Database, 1 pg., NT 4 Answers! Certified Tech Support, Users, Groups, and Domains, 6 pgs., NT 4 Answers! Certified Tech Support, User Profiles, 4 pgs., System Policies, pgs. 1, 1-4 <a href="http://library.books2x7.com.toc.asp?bkid=406">http://library.books2x7.com.toc.asp?bkid=406</a>	May 17, 2001
P	International Searching Authority, Notification of the Transmittal of The International Search Report, 7 pgs.	June 18, 2001

EXAMINER

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<input type="checkbox"/> Informal Drawings	_____	<input checked="" type="checkbox"/> Serial No. <u>091800,168</u>	
<input type="checkbox"/> Amendment/Response	_____	<input checked="" type="checkbox"/> Other <u>Information Disclosure Statement &amp; 4 Refs., PTO 1449</u>	

Name of Inventor(s):

Donald S. Brown, et al.

Title of Invention:

Computer Security System

Client of Applicant:

IT Technologies

BB File No.:

020431.0971

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BAKER BOTTS, L.L.P.

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